



January 31, 2008

Reply to Attn of:

CC-A

TO: Distribution

FROM: CC/Chief Counsel

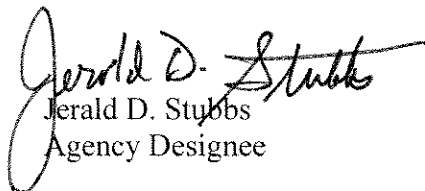
SUBJECT: Individual Determinations Regarding Attendance at a Reception Honoring the Visit of Mr. G. Madhavan Nair, Chairman of the Indian Space Research Organization, Hosted by the Space Foundation and Space Florida

You have been invited to attend a reception hosted by the Space Foundation and Space Florida in honor of the visit of Mr. G. Madhavan Nair, Chairman of the Indian Space Research Organization. The reception will take place at the KSC Rocket Garden on February 1, 2008. Approximately 170 guests have been invited to attend. These guests include a wide range of representatives from the space industry, members of academia, community leaders, and corporate executives. The approximate value of the reception is \$20 a person.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is an Agency interest in having you attend the event. The event will provide you with an opportunity to discuss matters of interest to NASA with a diverse group of other attendees representing the space industry. Through attendance, you will be able to publicize and discuss NASA's ongoing activities with domestic industry leaders as well as with a premier representative of the Indian space industry.

As institutional leaders, you each have duties that may substantially affect Space Florida and the Space Foundation. Because of this, the Standards of Ethical Conduct require me to make an individual determination weighing the Agency's interest in your attendance against the concern that this gift may appear to improperly influence you. I have determined NASA's interest in your participation does outweigh the concern that the gift of free attendance may or may appear to influence you in the performance of your official duties. In making this determination, I have considered the following: (1) the importance of the event to NASA; (2) the nature and sensitivity of pending matters affecting the sponsor; (3) the significance of your role in any such matters; (4) the purpose of the event; (5) the identity of other expected participants; and (6) the market value of the gift of free attendance. Accordingly, you may attend this event as a representative of NASA.

Finally, the invitation extends to you and your guests. Because this is an event where attendees will generally be accompanied by a spouse or other guest, you are authorized to accept free attendance for yourself and your guest.



Gerald D. Stubbs
Agency Designee

Distribution:

AA/W.W. Parsons

AA/J. Dowdy

AA-A/J. Petro

AA-B/J. Hattaway

AA-P/M. Wetmore

XA/L. Malone

XA/C. Hurst

XA-J1/D. Culp